

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR 21-023 NEB/LIB

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 924(c)(1)(A)(ii)

18 U.S.C. § 924(d)(1)

v.

18 U.S.C. § 1151

18 U.S.C. § 1153(a)

LEVI BRANDIN JEROME,

18 U.S.C. § 2111

28 U.S.C. § 2461(c)

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Robbery)

On or about November 11, 2020, in the State and District of Minnesota and within the exterior boundaries of the White Earth Indian Reservation, the defendant,

LEVI BRANDIN JEROME,

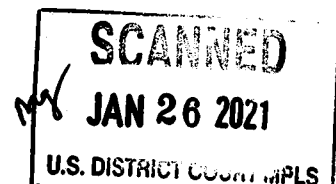
an Indian, by force, violence, and intimidation, took from the presence of another, Jane Doe 1, things of value, namely United States currency, all in violation of Title 18, United States Code, Sections 1151, 1153(a), and 2111.

COUNT 2

(Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of Violence)

On or about November 11, 2020, in the State and District of Minnesota, the defendant,

LEVI BRANDIN JEROME,



United States v. Levi Brandin Jerome

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the crime set forth in Count 1 of this Indictment, which is hereby re-alleged and incorporated herein by reference, did knowingly and unlawfully use, carry, and brandish a firearm, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

FORFEITURE ALLEGATIONS

Count 2 of this Indictment is hereby re-alleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c).

If convicted of Count 2 of this Indictment, the defendant,

LEVI BRANDIN JEROME,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm with accessories or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) including, but not limited to, an American Tactical Imports, model Omni Hybrid, multi-caliber rifle, bearing serial number NS064839 and any ammunition and accessories seized therewith.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON